

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZHI ZHONG QIU,

Plaintiff,

v.

ROBERT DIAMOND, JR., and ATLAS
MERCHANT CAPITAL LLC

Defendants.

Case No. 19-cv-2050-ER

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Declaration of Ross A. Wilson with annexed Exhibit A, and all other pleadings and papers in this matter, Defendant Atlas Merchant Capital LLC will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be determined by the Court, for an order dismissing with prejudice all claims asserted in Plaintiff's Complaint dated March 6, 2019, ECF No. 1, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for such other relief as the Court may deem just and proper. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: New York, New York
May 29, 2019

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Andrew G. Gordon

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